## J. David Morrissy

From: Ning Ye <yeningusa@gmail.com>
Sent: Thursday, May 02, 2019 11:10 AM
To: L David Morrison Harma Para in Marketing and Marke

To:

J. David Morrissy; Harry Dennis; Vanessa Lopez; Yeliang Xia

Subject: Notice of Deposition
Attachments: Notice2Depose.pdf

Dear Mr. Morrissy:

Forwarded to you is my Notice to Depose your client. Please check the attachment. Should you have any questions, please let me know ASAP. I believe one day deposing both for consolidation purpose will be in the best interests of both parties. Best regards! Ning Ye cc. all listed.

## IN THE U.S., DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA, ALEXANDRIA DIVISION

)
) Civil Action No. 18-cv-174 ) Notice to Take Deposition
)
)

## NOTICE TO TAKE DEPOSITION ON PLAINTIFF

Pursuant to Rule 30 and Rule 26 FRCP, in connection to Local Rules, please take Notice that Defendant Yeliang Xia will take oral deposition of Plaintiff Wengui Guo at 211 N Union Street, Suite 100, Alexandria, VA 22314 on May 8, 2019 starting at 2:00pm or alternatively, on May 9<sup>th</sup>, 2019, starting 9:30am at the same place, before a court reporter/notary public who is detached and disinterested in the outcome of the underlying case and is not related to the participating litigants. These foregoing proposed dates and time appears to match what Plaintiff proposed and it may consolidate all participating parties' preoccupied schedules and traveling plan.

Please take further notice that Plaintiff Guo Wengui, a person to be deposed, shall bring all books, documents being requested and demanded in Defendant's Request for Production of Documents, Interrogatory and Request for Admission with him for the purpose of turning over and for the examination.

Dated: May 2, 2019

/s/Ning Ye, Esq.

Counsel for the

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Flushing, NY 11354

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Fax: 718-228-5816

Email: yeningusa@gmail.com

To: Wengui Guo, Plaintiff. c/o

J. David Morrissy, Esq.

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Washington, DC 20004 dmorrissy@zeklaw.com Counsel for the Plaintiff